

*United States Attorney
Southern District of New York*

January 5, 2024

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Qingzhou Wang and Yiyi Chen*, 23 Cr. 302 (PGG)

Dear Judge Gardephe:

The Government writes to update the Court on the status of discovery in this case. Over the winter holidays and as recently as yesterday, the Government gained access to two cellphones belonging to defendant Yiyi Chen. The Government is now working to extract the data from those cellphones and anticipates producing the extractions to counsel for Chen next week. The Government will review the extractions pursuant to a search warrant and will identify materials responsive to the warrant. Because the phone contents are likely to be in Mandarin, both the Government and the defense will require some time to review this evidence.

In light of this update, counsel for Chen consents to the application of co-defendant Qingzhou Wang, (Dkt. 47), filed earlier today, to adjourn the pretrial conference presently scheduled for January 9, 2024. The Government respectfully moves to exclude Speedy Trial time until the next conference date so that the parties may review the discovery and so that the defense may consider any applicable pretrial motions. Counsel for both defendants consent to the exclusion of time.

Respectfully submitted,

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cc: All counsel of record (*by ECF*)